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NL Industries, Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

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NL INDUSTRIES, INC.,

Plaintiff,

vs.

OLD BRIDGE TOWNSHIP, et al.,

Defendants.

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Civil Case No.: 3:13-cv-03493-MAS-TJB

Electronically Filed

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**NOTICE OF MOTION TO ENTER FINAL JUDGMENT BY DEFAULT AGAINST  
DEFENDANTS KANE STEEL COMPANY, METALLON HOLDINGS CORP., AUWITE  
CONSTRUCTION CO., INC., AND PW ESQUIRE, CORP., INC.**

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Pursuant to Fed. R. Civ. P. 55(b)(2), Plaintiff NL Industries, Inc., by and through its counsel, Archer & Greiner, P.C., will move before the Honorable Michael A. Shipp at the Clarkson S. Fisher Building & U.S. Courthouse located at 402 East State Street, Trenton, NJ 08608, on December 4, 2017, at 9 a.m. or as soon thereafter as counsel may be heard, for an Order entering Final Judgment by Default against Defendants Kane Steel Company, Metallon Holdings, Inc., Auwite Construction Co., Inc., and PW Esquire, Corp., Inc.

Plaintiff NL Industries, Inc. shall rely upon its Brief and the Certification of Christopher R. Gibson in support of its motion for the entry of final judgment by default against Defendants Kane Steel Company, Metallon Holdings, Inc., Auwite Construction Co., Inc., and PW Esquire, Corp., Inc.

ARCHER & GREINER  
A Professional Corporation  
Attorneys for Plaintiff, NL Industries, Inc.

BY: s/ Christopher R. Gibson  
CHRISTOPHER R. GIBSON

Dated: November 2, 2017

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